ORIGINAL



I	BEFORE THE ARIZONA CORPORATION CO			
2 3 4 5 6 7 8 9	COMMISSIONERS GARY PIERCE – CHAIRMAN 2012 MAY 15 P 2: BOB STUMP SANDRA D. KENNEDY PAUL NEWMAN BRENDA BURNS	DOCKETED		
11 12 13 14 15 16 17 18 19 20 21	IN THE MATTER OF THE REVIEW AND POSSIBLE REVISION OF ARIZONA UNIVERSAL SERVICE FUND RULES, ARTICLE 12 OF THE ARIZONA ADMINISTRATIVE CODE.)	DOCKET NO. RT-00000H-97-0137		
	IN THE MATTER OF THE INVESTIGATION OF) THE COST OF TELECOMMUNICATIONS ACCESS)	DOCKET NO. T-00000D-00-0672		
22 23	NOTICE OF FI	LING		
24	Eschelon Telecom of Arizona, Inc., Mountain Telecommunications, Inc. and Electric			
25				
26	matter.			
27	Dated this 14 th day of May, 2012.			
28	Respectful	ly submitted,		
29 30 31 32 33 34 35 36 37	Cost and F Integra Te 1201 NE I Portland, 0 503-453-8 503-453-8	•		

1	BEFORE THE ARIZONA CORPORATION COMMISSION		
2			
3	COMMISSIONERS		
4			
5	GARY PIERCE – CHAIRMAN		
6	BOB STUMP		
7	SANDRA D. KENNEDY		
8	PAUL NEWMAN		
9	BRENDA BURNS		
10			
11			
12			
13	IN THE MATTER OF THE REVIEW AND)		
14	POSSIBLE REVISION OF ARIZONA)	DOCKET NO. RT-00000H-97-0137	
15	UNIVERSAL SERVICE FUND RULES,) ARTICLE 12 OF THE ARIZONA)	DOCKET NO. RT-00000H-97-0137	
16	ADMINISTRATIVE CODE.		
17	ADMINISTRATIVE CODE.		
18 19			
20	IN THE MATTER OF THE INVESTIGATION OF)	DOCKET NO. T-00000D-00-0672	
21	THE COST OF TELECOMMUNICATIONS)	20011211(0.1 000002 00 00,2	
22	ACCESS)		
23)		
24			
25	INITIAL COMMENTS OF INT	EGRA TELECOM	
26			
20			
27	Eschelon Telecom of Arizona, Inc., Mountain T	elecommunications, Inc., and Electric	
		, ,	
28	Lightwave, LLC. (collectively referred to as "Integra")	respectfully file these comments in	
29	response to the Commission's Procedural Order seeking comments and recommendations from		
30	parties on a number of issues. Although the <i>Procedural Order</i> seeks comments and		
50	parties on a number of issues. Anthough the Procedural	o, wo, books comments and	
31	recommendations on a number of issues, ² Integra's con	nments will focus on the impact of the	
		-	

¹ Procedural Order, In the Matter of the Review and Possible Revision of Arizona Universal Service Fund Rules, Article 12 of the Arizona Administrative Code and In the Matter of the Investigation of the Cost of Telecommunications Access, Docket Nos. RT-00000H-97-0137 and T-00000D-00-0672, March 20, 2012, p. 4 ("Procedural Order"). ² Procedural Order, pp. 4-6.

1 FCC's CAF Order³ on Intrastate access reform and why no further action is required from the

2 Commission at this time with respect to intrastate access.

Issue 1: In light of the *CAF Order*, is there a need for the Commission to determine what carriers should be covered by access reform, or a target level for intrastate access charges? Does the *CAF Order* address all access charge rate elements that have been addressed in these dockets? If not, should the Commission take action with respect to these rate elements? Does it make sense for the Commission to act on access charge reform while the *CAF Order* is on appeal, or while the FCC continues to consider comments on the Order?

The *CAF Order* subjected all local exchange carriers ("LECs") to intrastate access reform and mandates changes to intrastate access rates.⁴ The most significant of these changes takes effect July 1, 2012, when LECs are required to adjust intrastate terminating access rates toward interstate terminating access rates.⁵ In addition, the *CAF Order* and subsequent order on reconsideration addressed intrastate originating access for calls that originate or terminate as VoIP.⁶ The *CAF Order* did not address intrastate originating access for calls originated and terminated in TDM⁷ (non-VoIP), but indicated it will address these rates in the further notice of proposed rulemaking, for which comments are already underway.⁸ It is not necessary or desirable for this Commission to act on any additional access charge reform in light of the current activity of the FCC on the subject.

The *CAF Order* has already placed a large burden on LECs that bill access. The order has resulted in carriers (1) changing or altering billing systems to account for percent VoIP usage (PVU)⁹ factors; (2) reviewing PVU factors provided by other carriers; (3) renegotiating CMRS

³ Report and Order and Further Notice of Proposed Rulemaking, In the Matter of Developing an Unified Intercarrier Compensation Regime, CC Docket 01-92, CC 11-161, released November 18, 2011 ("CAF Order").

⁴ CAF Order, ¶ 801.

⁵ See for example 47 C.F.R. § 51.911 describing the transition process for competitive LECs.

⁶ See Second Order on Reconsideration, In the Matter of Developing an Unified Intercarrier Compensation Regime, CC Docket 01-92, FCC 12-47, released April 25, 2012, ¶ 2.

⁷ Time Division Multiplexing.

⁸ CAF Order, ¶ 1298.

⁹ Percent VoIP Usage.

agreements; (4) planning for near term (July 1, 2012) required tariff changes; and (5) planning

2 for longer term tariff changes and the resulting significant reductions in terminating access

revenue. Taking action in addition to what has already been put in motion by the FCC will

4 further tax LEC resources and add to the difficulty in implementing the *CAF Order*.

Issue 3: Given the *CAF Order*, does the Commission need to establish procedures to implement intrastate access reform? And if, yes, what procedures are recommended.

The Commission does not need to establish procedures to implement intrastate access reform. Under the *CAF Order* LECs are required to file intrastate access tariffs with intrastate terminating rate reductions effective July 1, 2012.¹⁰ The Commission's current policies and procedures for dealing with tariff filings are sufficient to allow for implementation of the *CAF Order*.¹¹

Issue 4: Given the CAF Order, does there remain a need to address the question of whether carriers should be permitted to contract for access rates that differ from their tariffed rates? If there is still a need, is the current record sufficient to resolve the issue?

The Commission does not need to address the issue as to whether carriers should be permitted to contract for access rates that differ from their tariffed rates. The FCC made clear in its CAF Order, "The transition we adopt sets a default framework, leaving carriers free to enter into negotiated agreements that allow for different terms." This unambiguous statement from the FCC makes it unnecessary for the Commission to act on the issue.

¹⁰ See, for example, 47 C.F.R. § 51.911 describing the transition process for competitive LECs.

¹¹ See, for example, Arizona Administrative Code R14-2-1106.

¹² CAF Order, ¶ 739.

2 3 4	of the reforms addressed in that Order, should the Commission take further action in these dockets? If yes, what?	
5	No further action is required from the Commission with respect to intrastate access rates	
6	in these dockets. The Commission's current policies and procedures for dealing with tariff	
7	filings are sufficient to allow for implementation of the CAF Order. 13	
8		
9 10 11 12	Issue 10 : Should the Commission seek carrier-specific information about the anticipated impact of the FCC's <i>CAF Order</i> on carrier revenues? If yes, from all carriers or, e.g., only from rate of return carriers?	
13	With respect to Competitive LECs, there is no reason for the Commission to seek carrier-	
14	specific information about the anticipated impact of the FCC's CAF Order on carrier revenues.	
15	Competitive LECs are not seeking cost recovery through regulated rates or through the Access	
16	Recovery Charge ("ARC") mechanism and therefore there is no action the for the Commission	
17	take with respect to revenue lost by Competitive LECs.	
18		
19 20 21	Issue 11 : Are there any other issues that can or should be addressed in these dockets? If yes, how should they be addressed procedurally?	
22	There are no additional issues, that have not already been raised in these dockets, that	
23	need to be addressed by the Commission.	
24		

¹³ See, for example, Arizona Administrative Code R14-2-1106.

Respectfully submitted,

Dylas Dy

2 4 5 6 7 8 9 10 11 12 13 14 Original and 15 copies filed this 15 14th day of May, 2012, with: 16 17 **Docket Control** 18 Arizona Corporation Commission 19 1200 West Washington Street 20 Phoenix, Arizona 85007 21 22 23 Copies of the foregoing mailed this 24 14th day of May, 2012, to: 25 26 Janice Alward, Chief Counsel 27 Legal Division 28 Arizona Corporation Commission 29 1200 West Washington Street 30 Phoenix, Arizona 85007 31 32 Jane L. Rodda 33 Administrative Law Judge 34 Hearing Division 35 Arizona Corporation Commission 36 1200 West Washington Street 37 Phoenix, Arizona 85007 38

1

Douglas Denney
Company Representative
Vice President, Cost and Policy
Integra Telecom
1201 NE Lloyd Blvd., Suite 500
Portland, Oregon 97232
503-453-8285 (Direct)
503-453-8223 (Department Fax)
dkdenney@integratelecom.com

Joan S. Burke Osborn Maledon, P.A. 2929 North Central Avenue Suite 2100 Phoenix, AZ 85012-2794 joan@jsburkelaw.com*

Steve Olea, Director Utilities Division Arizona Corporation Commission 1200 West Washington Street Phoenix, Arizona 85007

Michael Hallam	1	Thomas Campbell	Mark A. DiNunzio
1550 West Deer Valley Road			
40 North Central			
5 Phoenix, Arizona 85004 6 teampbell@lrlaw.com* 7 mhallam@lrlaw.com* 8	_		•
6 teampbell@trlaw.com* Mark.dinunzio@cox.com* 7 mihallam@trlaw.com* Gary Joseph 8 Gary Joseph 10 Chief Counsel 4633 West Polk Street 11 Residential Utility Consumer Office Phoenix, Arizona 85043 12 1110 West Washington, Suite 220 garyi@nationalbrands.com* 13 Phoenix, AZ 85007 Nathan Glazier 14 dpozefsky@azruco.gov* Nathan Glazier 15 Regional Manager ALLTEL COMMUNICATIONS, INC. 16 Michael M. Grant ALLTEL COMMUNICATIONS, INC. 17 Gallagher & Kennedy, P.A. 4805 East Thistle Landing Drive 18 2575 East Camelback Road Phoenix, AZ 85044 19 Phoenix, Arizona 85016-9225 Nathan.glazier@alltel.com* 10 mmg@gknet.com* Thomas W. Bade, President 21 Sabelle Salgado Arizona Dialtone, Inc. 22 Isabelle Salgado Arizona Dialtone, Inc. 23 AT&T NEVADA 6115 S. Kyrene Road, Suite 103 24 645 East Plumb Lane, B132 Chandler, AZ 85283 2 P.O. Box 11010 Tombade@arizonadialtone.com* 2 Ge1831@att.com Lyndall Nipps 3 Ge1831@att.com Lyndall Nipps <t< td=""><td></td><td></td><td></td></t<>			
The state of the color of the			•
Gary Joseph Sharenet Communications 463 West Polk Street 11 Residential Utility Consumer Office 12 1110 West Washington, Suite 220 13 Phoenix, AZ 85007 14 dpozefsky@azruco.gov* 15 Michael M. Grant 16 Michael M. Grant 17 Gallagher & Kennedy, P.A. 18 2575 East Camelback Road 19 Phoenix, Arizona 85016-9225 10 mg@gknet.com* 11 Thomas W. Bade, President 12 Isabelle Salgado 16 AT&T NEVADA 16 454 East Plumb Lane, B132 17 P.O. Box 11010 18 Reno, NV 89520 19 Dan.foley@att.com 19 Ge1831@att.com 29 Time Warner Telecom 29 Time Warner Telecom 29 Time Warner Telecom 20 Qwest Corporation 20 East Thomas Road, 16th Floor 21 Phoenix, Arizona 85012 22 Charles H. Carrathers, III 23 General Counsel, South Central Region 24 Phoenix, Arizona 85014 25 P.O. Box 1000 26 Reno, NY 89520 27 Dan.foley@att.com 29 Time Warner Telecom 30 Norm Curtright 31 Reed Peterson 32 Quest Corporation 33 Quest Thomas Road, 16th Floor 34 Phoenix, Arizona 85012 35 Michael W. Patten 36 Michael W. Patten 37 Roshka Dewlif & Patten, PLC 38 One Arizona Center 39 400 East Van Buren Street, Suite 600 40 Phoenix, AZ 85004 41 mpatten@rdp-law.com* 42 OrbitCom, Inc. 43 Brad Van Louise Avenue 44 Impatten@rdp-law.com* 45 Control House Avenue 46 Sioux Falls, SD 57107 46 bvanleur@svtv.com*			
9 Dan Pozefsky 10 Chief Counsel 11 Residential Utility Consumer Office 12 1110 West Washington, Suite 220 13 Phoenix, AZ 85007 14 dpozefsky@azruco.gov* 15 Reidential Utility Consumer Office 16 Michael M. Grant 17 Gallagher & Kennedy, P.A. 18 2575 East Camelback Road 19 Phoenix, Arizona 85016-9225 20 mmg@gknet.com* 21 Inomas W. Bade, President 22 Isabelle Salgado 23 AT&T NEVADA 24 645 East Plumb Lane, B132 25 P.O. Box 11010 26 Reno, NV 89520 27 Dan.folev@att.com 29 Inomas W. Bade, President, Regulatory 29 Time Warner Telecom 20 Qwest Corporation 21 Reed Peterson 22 Qwest Corporation 23 Quest Thomas Road, 16th Floor 24 Phoenix, Arizona 85012 25 Phoenix, Arizona 85012 26 One Arizona 85014 27 Dan. Foley@att.com 28 Genal W. Patten 39 Qwest Corporation 30 Nichael W. Patten 40 Deast Van Buren Street, Suite 600 40 Phoenix, AZ 85004 41 mpatten@drdp-law.com* 42 OrbitCom, Inc. 46 President 47 OrbitCom, Inc. 46 President 47 OrbitCom, Inc. 46 President 48 OrbitCom, Inc. 47 OrbitCom, Inc. 48 OrbitCom, Inc. 49 OrbitCom, Inc. 40 OrbitCom, Inc. 40 OrbitCom, Inc. 40 OrbitCom, Inc. 41 OrbitCom, Inc. 42 OrbitCom, Inc. 44 OrbitCom, Inc. 45 OrbitCom, Inc. 46 OrbitCom, Inc. 47 OrbitCom, Inc.			Gary Joseph
10 Chief Counsel 11 Residential Utility Consumer Office 12 1110 West Washington, Suite 220 13 Phoenix, AZ 85007 14 dpozefsky@azruco.gov* 15 Regional Manager 16 Michael M. Grant 17 Gallagher & Kennedy, P.A. 18 2575 East Camelback Road 19 Phoenix, AZ 85044 19 Phoenix, Az 85016-9225 10 mmg@gknet.com* 11 Thomas W. Bade, President 11 Arizona 85016-9225 11 Thomas W. Bade, President 12 Arath NevAdd 13 Arath NevAdd 14 Gath Canal Chandler, AZ 85283 15 P.O. Box 11010 16 Reno, NV 89520 17 Dan.foley@att.com 18 Cel 831@att.com 19 Cel 831@att.com 29 Time Warner Telecom 20 Qwest Corporation 21 Reed Peterson 22 Qwest Corporation 23 Quest Thomas Road, 16th Floor 24 Phoenix, Az 85012 25 Phoenix, Az 85014 26 Reno, Norm Curtright 27 Resident Arizona Both Central Region 28 Cel 831@att.com 39 Quest Corporation 30 Norm Curtright 31 Reed Peterson 32 Quest Thomas Road, 16th Floor 34 Phoenix, Az 85012 35 Phoenix, Az 85004 36 Michael W. Patten 37 Roshka DeWulf & Patten, PLC 38 One Arizona Center 39 400 East Van Buren Street, Suite 600 40 Phoenix, AZ 85004 41 mpatten@rdp-law.com* 42 OrbitCom, Inc. 43 Brad VanLeur, President 44 Trol North Louise Avenue 45 Sioux Falls, SD 57107 5 bvanleur@svtv.com*		Dan Pozefsky	· · · · · · · · · · · · · · · · · · ·
11 Residential Utility Consumer Office 12 1110 West Washington, Suite 220 13 Phoenix, AZ 85007 14 dpozefsky@azruco.gov* 15 Nathan Glazier 16 Michael M. Grant 17 Gallagher & Kennedy, P.A. 18 2575 East Camelback Road 19 Phoenix, Arizona 85016-9225 10 mmg@gknet.com* 11 Thomas W. Bade, President 12 AT&T NEVADA 13 AT&T NEVADA 14 G45 East Plumb Lane, B132 15 P.O. Box 11010 16 Reno, NV 89520 17 Dan.foley@att.com 18 Reed Peterson 19 Norm Curtright 11 Reed Peterson 11 Reed Peterson 12 Qwest Corporation 13 Quest Thomas Road, 16th Floor 14 Phoenix, Arizona 85012 15 Charles H. Carrathers, III 15 General Counsel, South Central Region 16 Verizon, Inc. 17 Callagher & Kennedy, P.A. 18 Carrathers, III 18 General Counsel, South Central Region 18 Verizon, Inc. 19 Charles H. Carrathers, III 19 General Counsel, South Central Region 19 Quest Corporation 20 Charles H. Carrathers, III 21 General Counsel, South Central Region 22 Charles H. Carrathers, III 23 General Counsel, South Central Region 24 Quest Carporation 25 Charles H. Carrathers, III 26 General Counsel, South Central Region 27 Phoenix, Arizona 85012 28 Charles H. Carrathers, III 28 General Counsel, South Central Region 29 Verizon, Inc. 29 Chuck.carrathers@verizon.com* 20 Dest Van Buren Street, Suite 600 20 Phoenix, AZ 85004 21 Charles H. Carrathers. 21 Charles H. Carrathers, III 22 General Counsel, South Central Region 29 Verizon, Inc. 29 Charles H. Carrathers. 20 Charles H. Carrathers. 20 Charles H. Carrathers. 21 Charles H. Carrathers. 22 Charles H. Carrathers. 23 Charles H. Carrathers. 24 Charles H. Carrathers. 25 Charles H. Carrathers. 26 On Hidden Ridge 27 Chuck.carrathers. 28 Carrathers. 29 Chuck.carrathers. 20 Chuck.carrathers. 20 Chuck.carrathers. 20 Chuck.carrathers. 20 Chuck.carrathers. 20 Chuck.carrathers. 21 Charles H. Carrathers. 22 Charles H. Carrathers. 23 Charles H. Carrathers. 24 Charles H. Carrathers. 24 Charles H. Carrathers. 25 Charles H. Carrathers. 26 Charles H. Carrathers. 27 Charles H. Carrathers. 28 Charles H. Carrathers. 29 Chuck.carrathers. 20 Cha			
1110 West Washington, Suite 220 garyj@nationalbrands.com*			
Phoenix, AZ 85007			
14 dpozefsky@azruco.gov* 15 Regional Manager 16 Michael M. Grant 17 Gallagher & Kennedy, P.A. 18 2575 East Camelback Road 19 Phoenix, Arizona 85016-9225 20 mmg@gknet.com* 21 Thomas W. Bade, President 22 Isabelle Salgado 23 AT&T NEVADA 24 645 East Plumb Lane, B132 25 P.O. Box 11010 26 Reno, NV 89520 27 Dan.foley@att.com 27 Dan.foley@att.com 28 GC1831@att.com 29 Time Warner Telecom 30 Norm Curtright 31 Reed Peterson 32 Qwest Corporation 33 QO East Thomas Road, 16 th Floor 34 Phoenix, Arizona 85012 35 Charles H. Carrathers, III 36 General Counsel, South Central Region 37 Verizon, Inc. 38 Michael W. Patten 39 One Arizona Center 30 One Arizona Center 31 Roshka DeWulf & Patten, PLC 32 One Arizona Center 33 One Arizona Center 34 Phoenix, AZ 85004 35 One Arizona Center 46 Phoenix, AZ 85004 47 Mpatten Michael W. Patten 48 One Arizona Center 49 Phoenix, AZ 85004 40 Phoenix, AZ 85004 41 Mpatten@rdp-law.com* 42 OrbitCom, Inc. 43 Brad VanLeur, President 44 OrbitCom, Inc. 45 Grid H. Patten 46 OrbitCom, Inc. 47 OrbitCom, Inc. 48 Grid H. Porticom, Inc. 48 Grid H. Porticom, Inc. 49 OrbitCom, Inc. 40 OrbitCom, Inc. 41 Driving, Texas 75015-2092 42 Chuck.carrathers@verizon.com* 44 OrbitCom, Inc. 45 Grid H. Porticom, Inc. 46 Grid H. Porticom, Inc. 47 OrbitCom, Inc. 48 Grid H. Porticom, Inc. 49 OrbitCom, Inc. 40 OrbitCom, Inc. 41 OrbitCom, Inc. 42 OrbitCom, Inc. 43 Grid H. Porticom, Inc. 44 OrbitCom, Inc. 45 Sioux Falls, SD 57107 46 Ovanleur@svtv.com*			<u>B</u> (1).
Regional Manager ALLTEL COMMUNICATIONS, INC. Gallagher & Kennedy, P.A. 4805 East Thistle Landing Drive Phoenix, Arizona 85016-9225 mmg@gknet.com* Thomas W. Bade, President Arizona Dialtone, Inc. Stabelle Salgado Arizona Dialtone, Inc. Arizona Norm Curtight Reed Peterson Qwest Corporation Qwest Corporation Come Arizona 85012 Michael W. Patten Roshka DeWulf & Patten, PLC Roshk			Nathan Glazier
16 Michael M. Grant 17 Gallagher & Kennedy, P.A. 18 2575 East Camelback Road 19 Phoenix, Arizona 85016-9225 20 mmg@gknet.com* 21 Thomas W. Bade, President 22 Isabelle Salgado 23 AT&T NEVADA 24 645 East Plumb Lane, B132 25 P.O. Box 11010 26 Reno, NV 89520 27 Dan foley@att.com 27 Dan foley@att.com 28 Gel831@att.com 29 Vice President, Regulatory 20 Time Warner Telecom 20 Norm Curtright 21 Reed Peterson 22 Qwest Corporation 23 Quest Corporation 24 General Counsel, South Central Region 25 Phoenix, Arizona 85012 26 Michael W. Patten 27 Roshka DeWulf & Patten, PLC 38 Michael W. Patten 39 Michael W. Patten 40 East Van Buren Street, Suite 600 41 Michael W. Patten 41 Michael W. Patten 42 One Arizona Center 43 Michael W. Patten 44 Mipatten@rdp-law.com* 45 Charles H. Carrathers@verizon.com* 46 Driving, Texas 75015-2092 47 Chuck.carrathers@verizon.com* 48 Drobate. 49 OrbitCom, Inc. 40 Brad Van Leur, President 41 Mipatten@rdp-law.com* 41 Michael W. Petsident 42 OrbitCom, Inc. 43 Brad Van Leur, President 44 Drobate. 45 Sioux Falls, SD 57107 46 bvanleur@svtv.com*		<u>apozotok) (ojazrato.go:</u>	
17 Gallagher & Kennedy, P.A. 18 2575 East Camelback Road 19 Phoenix, Az 85044 19 Phoenix, Azizona 85016-9225 20 mmg@gknet.com* 21 Thomas W. Bade, President 22 Isabelle Salgado Arizona Dialtone, Inc. 23 AT&T NEVADA 6115 S. Kyrene Road, Suite 103 24 645 East Plumb Lane, B132 Chandler, AZ 85283 25 P.O. Box 11010 Tombade@arizonadialtone.com* 26 Reno, NV 89520 27 Dan.foley@att.com 28 Gc1831@att.com 29 Vice President, Regulatory 29 Time Warner Telecom 30 Norm Curtright 31 Reed Peterson 32 Qwest Corporation 33 20 East Thomas Road, 16th Floor 34 Phoenix, Arizona 85012 35 Charles H. Carrathers, III 36 General Counsel, South Central Region 37 Wichael W. Patten 38 One Arizona Center 39 400 East Van Buren Street, Suite 600 40 Phoenix, AZ 85004 41 mpatten@rdp-law.com* 42 OrbitCom, Inc. 43 Brad VanLeur, President 44 Droit Control Co		Michael M. Grant	
18 2575 East Camelback Road 19 Phoenix, Arizona 85016-9225 20 mmg@gknet.com* 21 Thomas W. Bade, President 22 Isabelle Salgado 23 AT&T NEVADA 24 645 East Plumb Lane, B132 25 P.O. Box 11010 26 Reno, NV 89520 27 Dan.foley@att.com 28 Gc1831@att.com 29 Time Warner Telecom 30 Norm Curtright 31 Reed Peterson 32 Qwest Corporation 33 Qo East Thomas Road, 16 th Floor 34 Phoenix, Arizona 85012 36 Michael W. Patten 37 Roshka DeWulf & Patten, PLC 38 One Arizona Center 39 Go Harles Van Buren Street, Suite 600 40 Fast Van Buren Street, Suite 600 40 Phoenix, AZ 85004 41 mpatten@rdp-law.com* 42 OrbitCom, Inc. 43 Brad Van Leur, President 44 Orbit Com, Inc. 45 Sioux Falls, SD 57107 46 bvanleur@svtv.com*			
19 Phoenix, Arizona 85016-9225 mmg@gknet.com* 10 Thomas W. Bade, President 21 Isabelle Salgado 22 AT&T NEVADA 23 AT&T NEVADA 26 Esast Plumb Lane, B132 27 P.O. Box 11010 28 Reno, NV 89520 29 Dan.foley@att.com 29 Time Warner Telecom 30 Norm Curtright 31 Reed Peterson 32 Qwest Corporation 33 Quest Corporation 34 Phoenix, Arizona 85012 35 Phoenix, Arizona 85012 46 Phoenix, Arizona 85012 56 Charles H. Carrathers, III 57 General Counsel, South Central Region 58 Verizon, Inc. 59 Verizon, Inc. 50 HQE03H52 50 One Arizona Center 50 Hidden Ridge 50 Phoenix, AZ 85004 51 Phoenix, AZ 85004 52 President, Regulatory 53 Time Warner Telecom 54 Phoenix, Arizona 85012 56 Charles H. Carrathers, III 57 General Counsel, South Central Region 58 Verizon, Inc. 59 Verizon, Inc. 50 Hidden Ridge 50 Hidden Ridge 51 Van Buren Street, Suite 600 51 Phoenix, AZ 85004 52 President 53 Problem Verizon, Inc. 54 Problem Verizon, Inc. 56 Phoenix, AZ 85004 57 Problem Verizon, Inc. 58 Problem Verizon, Inc. 59 Problem Verizon, Inc. 600 Hidden Ridge 600 Hidden Ridg		•	
mmg@gknet.com* Isabelle Salgado Arizona Dialtone, Inc. AT&T NEVADA 6115 S. Kyrene Road, Suite 103 Chandler, AZ 85283 P.O. Box 11010 Tombade@arizonadialtone.com* Reno, NV 89520 Dan.foley@att.com Gc1831@att.com Vice President, Regulatory Time Warner Telecom Norm Curtright Reed Peterson Reed Peterson Palm Springs, CA 92262 Lyndall.Nipps@twtelecom.com* 20 East Thomas Road, 16 th Floor Phoenix, Arizona 85012 Charles H. Carrathers, III General Counsel, South Central Region Verizon, Inc. Norm Curtright Apatten Phoenix, Arizona Center One Arizona Center Phoenix, AZ 85004 Phoenix, AZ 850			
Thomas W. Bade, President Arizona Dialtone, Inc. AT&T NEVADA 6115 S. Kyrene Road, Suite 103 Chandler, AZ 85283 Chandler, AZ 85283 P.O. Box 11010 Reno, NV 89520 Lyndall Nipps Gc1831@att.com Norm Curtright Reed Peterson Qwest Corporation Quest Corporation Arizona S5012 Charles H. Carrathers, III General Counsel, South Central Region Michael W. Patten Roshka DeWulf & Patten, PLC Michael W. Patten Roshka DeWulf & Patten, PLC One Arizona Center Michael W. Patten Phoenix, AZ 85004 Mipatten@rdp-law.com* Thomas W. Bade, President Arizona Dialtone, Inc. Charler, AZ 85283 Chandler, AZ 85283 Tombade@arizonadialtone.com* Lyndall Nipps Warner Telecom 845 Camino Sur Palm Springs, CA 92262 Lyndall.Nipps@twtelecom.com* Charles H. Carrathers, III General Counsel, South Central Region Verizon, Inc. HQE03H52 One Arizona Center G00 Hidden Ridge Irving, Texas 75015-2092 Chuck.carrathers@verizon.com* Mpatten@rdp-law.com* OrbitCom, Inc. Brad VanLeur, President 1701 North Louise Avenue Sioux Falls, SD 57107 bvanleur@svtv.com*			
22 Isabelle Salgado Arizona Dialtone, Inc. 23 AT&T NEVADA 4645 East Plumb Lane, B132 Chandler, AZ 85283 Chan			Thomas W. Bade, President
AT&T NEVADA 4 645 East Plumb Lane, B132 5 P.O. Box 11010 6 Reno, NV 89520 7 Dan.foley@att.com 6 Cl831@att.com Norm Curtright 1 Reed Peterson 2 Qwest Corporation 2 Qwest Corporation 3 20 East Thomas Road, 16 th Floor Phoenix, Arizona 85012 Michael W. Patten Roshka DeWulf & Patten, PLC 30 One Arizona Center 400 East Van Buren Street, Suite 600 Phoenix, AZ 85004 mpatten@rdp-law.com* 6115 S. Kyrene Road, Suite 103 Chandler, AZ 85283 Tombade@arizonadialtone.com* Lyndall Nipps Vice President, Regulatory Time Warner Telecom 845 Camino Sur Palm Springs, CA 92262 Lyndall.Nipps@twtelecom.com* Charles H. Carrathers, III General Counsel, South Central Region Verizon, Inc. HQE03H52 600 Hidden Ridge Irving, Texas 75015-2092 Chuck.carrathers@verizon.com* mpatten@rdp-law.com* OrbitCom, Inc. Brad VanLeur, President 1701 North Louise Avenue Sioux Falls, SD 57107 bvanleur@svtv.com*		Isabelle Salgado	· · · · · · · · · · · · · · · · · · ·
24 645 East Plumb Lane, B132 P.O. Box 11010 Reno, NV 89520 25 Dan.foley@att.com 26 C1831@att.com 27 Dan.foley@att.com 28 Gc1831@att.com 29 Vice President, Regulatory 29 Time Warner Telecom 30 Norm Curtright 31 Reed Peterson 32 Qwest Corporation 33 20 East Thomas Road, 16 th Floor 34 Phoenix, Arizona 85012 35 General Counsel, South Central Region 36 Michael W. Patten 37 Roshka DeWulf & Patten, PLC 38 One Arizona Center 39 400 East Van Buren Street, Suite 600 40 Phoenix, AZ 85004 41 mpatten@rdp-law.com* 42 OrbitCom, Inc. 43 Brad VanLeur, President 44 1701 North Louise Avenue 45 Sioux Falls, SD 57107 46 bvanleur@svtv.com*		•	· · · · · · · · · · · · · · · · · · ·
25 P.O. Box 11010 Reno, NV 89520 27 Dan.foley@att.com 28 Gc1831@att.com 29 Vice President, Regulatory 29 Time Warner Telecom 30 Norm Curtright 31 Reed Peterson 32 Qwest Corporation 33 20 East Thomas Road, 16 th Floor 34 Phoenix, Arizona 85012 Michael W. Patten 36 Michael W. Patten 37 Roshka DeWulf & Patten, PLC 38 One Arizona Center 39 400 East Van Buren Street, Suite 600 40 Phoenix, AZ 85004 41 mpatten@rdp-law.com* 42 OrbitCom, Inc. 43 Brad VanLeur, President 44 Orbit Com, Inc. 45 Brad VanLeur, President 46 Sioux Falls, SD 57107 46 bvanleur@svtv.com*			- · · · · · · · · · · · · · · · · · · ·
26 Reno, NV 89520 27 Dan.foley@att.com 28 Gc1831@att.com 29 Vice President, Regulatory 29 Time Warner Telecom 30 Norm Curtright 31 Reed Peterson 32 Qwest Corporation 33 20 East Thomas Road, 16 th Floor 34 Phoenix, Arizona 85012 36 Michael W. Patten 37 Roshka DeWulf & Patten, PLC 38 One Arizona Center 39 400 East Van Buren Street, Suite 600 40 Phoenix, AZ 85004 41 mpatten@rdp-law.com* 42 OrbitCom, Inc. 43 Brad VanLeur, President 44			
27 Dan.foley@att.com 28 Gc1831@att.com 29 Vice President, Regulatory 29 Time Warner Telecom 30 Norm Curtright 31 Reed Peterson 32 Qwest Corporation 33 20 East Thomas Road, 16 th Floor 34 Phoenix, Arizona 85012 36 Michael W. Patten 37 Roshka DeWulf & Patten, PLC 38 One Arizona Center 39 400 East Van Buren Street, Suite 600 40 Phoenix, AZ 85004 41 mpatten@rdp-law.com* 42 OrbitCom, Inc. 43 Brad VanLeur, President 44 1701 North Louise Avenue 45 Sioux Falls, SD 57107 46 bvanleur@svtv.com*			
Vice President, Regulatory Time Warner Telecom Norm Curtright Reed Peterson Palm Springs, CA 92262 Lyndall.Nipps@twtelecom.com* Lyndall.Nipps@twtelecom.com* Lyndall.Nipps@twtelecom.com* Phoenix, Arizona 85012 Charles H. Carrathers, III General Counsel, South Central Region Verizon, Inc. Roshka DeWulf & Patten Verizon, Inc. Roshka Dewulf & Patten, PLC HQE03H52 One Arizona Center One Arizona Center Phoenix, AZ 85004 Phoenix, AZ 85004 Chuck.carrathers@verizon.com* CrbitCom, Inc. Brad VanLeur, President CrbitCom, Inc. Brad VanLeur, President Croiv Com, Inc. Croiv C		·	Lyndall Nipps
Time Warner Telecom 30 Norm Curtright 31 Reed Peterson 32 Qwest Corporation 33 20 East Thomas Road, 16 th Floor 34 Phoenix, Arizona 85012 Charles H. Carrathers, III General Counsel, South Central Region Verizon, Inc. 37 Roshka DeWulf & Patten, PLC 39 400 East Van Buren Street, Suite 600 40 Phoenix, AZ 85004 mpatten@rdp-law.com* 41 Mpatten@rdp-law.com* 42 OrbitCom, Inc. 43 Brad VanLeur, President 44 1701 North Louise Avenue 45 Sioux Falls, SD 57107 bvanleur@svtv.com*			•
30 Norm Curtright 31 Reed Peterson 32 Qwest Corporation 33 20 East Thomas Road, 16 th Floor 34 Phoenix, Arizona 85012 35 Charles H. Carrathers, III 36 General Counsel, South Central Region 37 Roshka DeWulf & Patten 38 One Arizona Center 39 400 East Van Buren Street, Suite 600 40 Phoenix, AZ 85004 41 mpatten@rdp-law.com* 42 OrbitCom, Inc. 43 Brad VanLeur, President 44 1701 North Louise Avenue 45 Sioux Falls, SD 57107 46 bvanleur@svtv.com*			, v
Reed Peterson Qwest Corporation Lyndall.Nipps@twtelecom.com* Lyndall.Nipps@twtelecom.com* Lyndall.Nipps@twtelecom.com* Lyndall.Nipps@twtelecom.com* Charles H. Carrathers, III General Counsel, South Central Region Michael W. Patten Nerizon, Inc. Roshka DeWulf & Patten, PLC None Arizona Center None Arizona Center Palm Springs, CA 92262 Lyndall.Nipps@twtelecom.com* Charles H. Carrathers, III General Counsel, South Central Region Verizon, Inc. HQE03H52 600 Hidden Ridge Irving, Texas 75015-2092 Chuck.carrathers@verizon.com* Palm Springs, CA 92262 Lyndall.Nipps@twtelecom.com* Charles H. Carrathers, III General Counsel, South Central Region Verizon, Inc. HQE03H52 OrbitCom, Inc. Brad VanLeur, President 1701 North Louise Avenue Sioux Falls, SD 57107 bvanleur@svtv.com*		Norm Curtright	
20 East Thomas Road, 16 th Floor 32 Phoenix, Arizona 85012 Charles H. Carrathers, III 35 General Counsel, South Central Region 36 Michael W. Patten Verizon, Inc. 37 Roshka DeWulf & Patten, PLC HQE03H52 38 One Arizona Center 600 Hidden Ridge 39 400 East Van Buren Street, Suite 600 Irving, Texas 75015-2092 40 Phoenix, AZ 85004 Chuck.carrathers@verizon.com* 41 mpatten@rdp-law.com* 42 OrbitCom, Inc. 43 Brad VanLeur, President 44 1701 North Louise Avenue 45 Sioux Falls, SD 57107 46 bvanleur@svtv.com*		•	Palm Springs, CA 92262
20 East Thomas Road, 16 th Floor 34 Phoenix, Arizona 85012 Charles H. Carrathers, III General Counsel, South Central Region Verizon, Inc. Roshka DeWulf & Patten, PLC One Arizona Center 400 East Van Buren Street, Suite 600 Phoenix, AZ 85004 mpatten@rdp-law.com* Charles H. Carrathers, III General Counsel, South Central Region Verizon, Inc. HQE03H52 600 Hidden Ridge Irving, Texas 75015-2092 Chuck.carrathers@verizon.com* OrbitCom, Inc. Brad VanLeur, President 1701 North Louise Avenue Sioux Falls, SD 57107 bvanleur@svtv.com*			
Charles H. Carrathers, III General Counsel, South Central Region Verizon, Inc. Roshka DeWulf & Patten, PLC HQE03H52 One Arizona Center HQE03H52 One Arizona Center Floor Hoenix, AZ 85004 Phoenix, AZ 85004 Irving, Texas 75015-2092 Chuck.carrathers@verizon.com* Chuck.carrathers@verizon.com* OrbitCom, Inc. Brad VanLeur, President Toll North Louise Avenue Sioux Falls, SD 57107 bvanleur@svtv.com*	33	20 East Thomas Road, 16 th Floor	33.4. **********************************
General Counsel, South Central Region Wichael W. Patten Roshka DeWulf & Patten, PLC Werizon, Inc. HQE03H52 One Arizona Center Floor HQE03H52 One Arizona Center Floor HQE03H52 One Arizona Center Floor HQE03H52 Floor H			Charles H. Carrathers, III
Michael W. Patten Roshka DeWulf & Patten, PLC One Arizona Center MQE03H52 One Arizona Center MOE03H52 One Arizona Center MOE03H52 Cone Hidden Ridge Irving, Texas 75015-2092 Chuck.carrathers@verizon.com* Chuck.carrathers@verizon.com* OrbitCom, Inc. Brad VanLeur, President 1701 North Louise Avenue Sioux Falls, SD 57107 bvanleur@svtv.com*			· · · · · · · · · · · · · · · · · · ·
37 Roshka DeWulf & Patten, PLC 38 One Arizona Center 39 400 East Van Buren Street, Suite 600 40 Phoenix, AZ 85004 41 mpatten@rdp-law.com* 42 43 44 45 45 46 46 48 49 HQE03H52 600 Hidden Ridge Irving, Texas 75015-2092 Chuck.carrathers@verizon.com* Chuck.carrathers@verizon.com* OrbitCom, Inc. Brad VanLeur, President 1701 North Louise Avenue Sioux Falls, SD 57107 bvanleur@svtv.com*		Michael W. Patten	,
38 One Arizona Center 39 400 East Van Buren Street, Suite 600 40 Phoenix, AZ 85004 41 mpatten@rdp-law.com* 42 OrbitCom, Inc. 43 Brad VanLeur, President 44 1701 North Louise Avenue 45 Sioux Falls, SD 57107 46 bvanleur@svtv.com*			
39 400 East Van Buren Street, Suite 600 40 Phoenix, AZ 85004 41 mpatten@rdp-law.com* 42 OrbitCom, Inc. 43 Brad VanLeur, President 44 1701 North Louise Avenue 45 Sioux Falls, SD 57107 46 bvanleur@svtv.com*		•	
40 Phoenix, AZ 85004 41 mpatten@rdp-law.com* 42 OrbitCom, Inc. 43 Brad VanLeur, President 44 1701 North Louise Avenue 45 Sioux Falls, SD 57107 46 bvanleur@svtv.com*			•
41 mpatten@rdp-law.com* 42 OrbitCom, Inc. 43 Brad VanLeur, President 44 1701 North Louise Avenue 45 Sioux Falls, SD 57107 46 bvanleur@svtv.com*			- -
OrbitCom, Inc. Brad VanLeur, President 1701 North Louise Avenue Sioux Falls, SD 57107 bvanleur@svtv.com*			
Brad VanLeur, President 1701 North Louise Avenue Sioux Falls, SD 57107 bvanleur@svtv.com*			OrbitCom, Inc.
44 1701 North Louise Avenue 45 Sioux Falls, SD 57107 46 bvanleur@svtv.com*			•
Sioux Falls, SD 57107 bvanleur@svtv.com*			·
46 <u>bvanleur@svtv.com</u> *			
		*	
47	47		

1 Rex Knowles 14 20

2 Executive Director – Regulatory 3 XO Communications 4 111 East Broadway, Suite 1000 5 Salt Lake City, UT 84111 6 Rex.knowles@xo.com* 8 William A. Haas 9 Deputy General Counsel 10 McLeodUSA Telecommunications 11 6400 C Street SW 12 Cedar Rapids, Iowa 52406 13 Bill.Haas@mcleodusa.com* 15 Paul Castaneda, President 16 Local 7019 17 2501 West Dunlap, Suite 103 18 Phoenix, AZ 85021 19 pcastaneda@cwa7019.org 21 Greg L. Rogers 22 Senior Corporate Counsel 23 Level 3 Communications 24 1025 Eldorado Blvd. 25 Broomfield, CO 80021

Stephen H. Kukta Director and Counsel Sprint Nextel 201 Mission Street, Suite 1500 San Francisco, CA 94105 Stephen.h.kukta@sprint.com Charlie Born, Manager

Government and External Affairs Frontier Communications P.O. Box 340 Elk Grove, CA 95759 Charlie.Born@ftr.com

Phyllis A. Whitten Associate General Counsel **Frontier Communications** P.O. Box 340 Elk Grove, CA 95759 Phyllis.Whitten@ftr.com

Craig A. Marks 10645 North Tatum Blvd. Suite 200-676 Phoenix, AZ 85028 Craig.Marks@azbar.org

26 <u>Greg.rogers@level3.com</u>